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6 Attorneys for Defendants COUNTY OF SAN BERNARDINO

7 and SHERIFF SHANNON D. DICUS

8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 COLLEEN MANGHANE; and
ROBERT MANGHANE

12 Plaintiffs,

13 vs.

14 COUNTY OF SAN BERNARDINO;
15 SHANNON DICUS; DESERT
VALLEY HOSPITAL; and DOES 1-
16 15, inclusive.

17
18 Defendants.

Case No. 5:25-cv-01107-JGB (DTBx)

*Assigned for All Purposes to
Honorable Jesus G. Bernal*

Magistrate Judge: David T. Bristow

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND TO
PLAINTIFFS' INITIAL
COMPLAINT;
[PROPOSED] ORDER**

Complaint Filed: 5/7/2025

Trial Date: None Set

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1 Defendants COUNTY OF SAN BERNARDINO and SHERIFF SHANNON
2 D. DICUS (collectively “Defendants”) by and through its undersigned counsel, and
3 Plaintiffs COLLEEN MANGHANE and ROBERT MANGHANE (collectively
4 “Plaintiffs”) by and through their undersigned counsel, hereby stipulate and request
5 the Court grant Defendants an additional thirty- day extension of time to respond to
6 Plaintiffs’ Initial Complaint for good cause.

7 As previously reported, the parties have met and conferred and believe that this
8 case should be consolidated with *Arthur James, et al. v. County of San Bernardino, et*
9 *al.*, Case No. 5:25-cv-00140-WLH-SHK. Should consolidation be ordered, this matter
10 will likely be reassigned to Judge Hsu because the *James* matter was filed before this
11 matter. The parties in both this matter and the *James* matter have stipulated that
12 consolidation is appropriate and are working on finalizing and filing a stipulation to
13 that effect. As such, to conserve judicial resources the parties herein seek a
14 continuance until August 22, 2025 for Defendants to respond to the initial Complaint.
15 This should allow sufficient time for the Court to determine whether consolidation is
16 appropriate, and should this matter be transferred, Defendants can file their Motion to
17 Dismiss with Judge Hsu.

18 **IT IS SO STIPULATED**

19 DATED: July 18, 2025

LYNBERG & WATKINS
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21 By: */s/Edward J. Southcott*
22 **SHANNON L. GUSTAFSON**
23 **EDWARD J. SOUTHCOTT**
24 Attorneys for Defendants
COUNTY OF SAN BERNARDINO and
SHERIFF SHANNON D. DICUS

1 DATED: July 18, 2025

LAW OFFICES OF DALE K. GALIPO

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3 By: */s/Marcel F. Sincich*

DALE K. GALIPO

MARCEL F. SINCICH

Attorneys for Plaintiffs

COLLEEN MANGHANE and ROBERT
MANGHANE

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8 I certify that all parties to this document have consented to its filing and to the
9 language contained herein and have authorized the undersigned to affix their
10 electronic signatures.

11 DATED: July 18, 2025

LYNBERG & WATKINS

A Professional Corporation

12
13
14 By: */s/Edward J. Southcott*

SHANNON L. GUSTAFSON

EDWARD J. SOUTHCOTT

Attorneys for Defendants

County of San Bernardino and SHERIFF
SHANNON D. DICUS